

SCANNED

DATE: 08/18/04 In the United States District Court
ex: Sky For Southern District of Florida

Emanuel Washington,

Plaintiff

V.

Traci Jenkins, Casemanager.

Santos, Unit manager, B.O.P.

staff of Coleman, Bo.P.,

Kennedy, E. Sharma, et al.,

Defendants.

Civil Action

Civil No.

Motion for injunction and Declaratory Relief

I. This action arises under the provision of the eighth, first, sixth, and Fourteenth Amendments of the U.S. Constitution, and under title 42, United States Code § 1983. This Honorable Court has jurisdiction of this action under title 28, United States Code § 1333.

II. This action is brought pursuant to Rule 23 of the Federal rules of civil procedure, on behalf of plaintiff, who is now incarcerated in B.O.P Coleman - USP, Special Housing in Florida.

Plaintiff is hereby entitled to and requests the interest
of the Plaintiff and the respective court that this
Honorable Court specially afford plaintiff of this action an attempt
to ensure that the order of release contained herein this
document, action be presented to this court and receive the
appropriate consideration and attention.

III

Plaintiff is a citizen of the United States and a prisoner
in B.C.P. Coleman, County of Collier, State of Florida.

IV

Defendant was, and at all times material hereto was,
the duly appointed Executive Director of B.C.P. Coleman in
charge of B.C.P. Coleman-1BP.

V

Plaintiff has attempted to exhaust all administrative
remedies in the post and prior institutions to no avail. I
have found no fault by the administration whereby
process is impeded by the same judge is obliged to
make a mistake. I have found that minor differences of
understanding, or a fact that I am not about to
specify, and every effort to prevail cannot from going
to the next step, which is lit.

Plaintiff filed this action to set aside such claims
in my complaint stay filed by United States District
Judge Thaddeus P. H. B. Senter in Boston, Massachusetts.
According to my understanding of the law and action I
have, this stayed it may not the entire case. It has
been subjected to me throughout my investigation in
the BOP. Furthermore, to continue to try to resolve complaint
of staff abuse threats, and misconduct of her assessment and
institution to complain to supervisor internally is to
inevitably invite unnecessary retaliation of her assessment. Such
that I am advised by 14 USC § 1414
and 1414A. Inability to complain
and file a complaint.

1) Plaintiff has reported his or her being held in
"H.Q. with" her complaining to supervisor about staff
misconduct and the long known to address the events in
search of filing a complaint of constitutional protection
rights.

2) Plaintiff has taken down letters of keep
my file. Plaintiff is still listed, and I am
to all my file counts and OIG and OH in. I have a
letter dated 10/20/03 regarding a complaint to the Office
of Civil Rights (OCR) in Washington D.C. which is
violation of the Privacy Act.

3) Plaintiff has been held without charging since accused
for not having all the required identification papers which he
Knew he possessed & can prove he had them. He has
been held in solitary confinement in the infirmary by
A. L. Ward and Ward has been continuing to supervise
about Stoll's misconduct and his assault. I have been
threatened with bodily harm and threatened that I won't
make it home soon if I don't stop complaining to Stoll
supervisors. I am taking this case because it is stick
together against inmates right or wrong! I have received
several disciplinary reports which were expunged for
being bogus to keep them being admitted as exhibits.
See exhibits.

VI. Defendants had the acts of the defendant's alleged
abuse in excess done by defendant to make out pretense
not the state regulations, customs, and usage of the state of
Florida, and under the authority of her/his office as county
and staff member of the B.C.P. for the state of Florida.

VII. Plaintiff have suffered injury or death at the
hands of parties (or commissions) set out above.

VIII. Defendants violated plaintiff of the eight
amicable process and usual protection secured by the Fourteenth
Amendment of the United States Constitution.

X. Because of the foregoing plaintiff, however, makes a ready
and true and is willing, and will twice to suffer great and
irreparable loss by reason of injury and is, therefore, compelled
to seek suitable relief in this court.

Other for plaintiff to seek judgment;

2) Entitling to my and Plaintiff jointly and severally to the
further damages plaintiff has right to do process and usual
protection of the Fourteenth Amendment above this, attorney
fees and costs in this suit.

- 1.) Plaintiff shall file the complaint and exhibits of this action, including attorney's fees.
- 2.) Plaintiff shall seek attorney's fees.

Dated: 07.2.004

Certificate of Service

The original of above action was sent to U.S.
Federal District Court for Miami Florida, 303 NE
1st AVE ROOM 315, Miami FL 33132 on ____ 004.

Respectfully,

Emmanuel Washington
Emmanuel Washington
ECC USP
P.O. BOX 1033
Columbus, FL 33521-0879

(6)

Date last 14th District Court
to the 2nd Distr of Florida

11 Washington

Plat. 4

V

18th 2004

To the Clerk of Courts Civil Action
States that in re, Randy Civil No.

134-04-B.C.P. et al of

134-04-B.C.P. et al,

Defendants

To the above-mentioned Defendants.

You are by present and notice to serve
upon defendant whose address is 8416 N.E. 54th Terrace,
Coral Gables 33131-1029 in answer to the complaint
which is here with served upon you with 30 days after
service of this summons open your exclusive of the day of
service. If you fail to do so, judgment by default will be
taken against you for the relief demanded in the complaint.

Clark & Clark

Dated: 08 _____ 2004

Ort United States District Court
For Southern District of Florida

Court Washington, D.C.
Plaintiff
V.
John E. Kim, Complainant, Civil Action
F. Bureau of Investigation, BOP Civil No. _____
FBI at Miami, B.O.P.
Plaintiff, Clerk
Defendant

I do solemnly declare that the foregoing typewritten and signed by me is true to the best of my knowledge, account and facts fully true and to the best of my knowledge, account and facts fully true to the best of my knowledge and facts contained herein.

Subscribed and sworn to before me
the 1st day of August, 2004

Court Washington,
Florida

In the United States District Court
For the District of Florida

Plaintiff
Pl. #4
V.
Tori J. Kennedy, Esq., Plaintiff's attorney
Estates Estate
Kathy L. P. R.P.
H. Charles C. Bell Civil Action
et al. Civil No.
Def. L. D.

Upon the application, supporting affidavit of Plaintiff,
and in view of the submissions therewith, it is:
Ordered that Defendants Tori J. Kennedy, Estates
Kennedy, Esq., et al., show cause on or before 315 of the United
States Courthouse.

on the
1st day of August, 2004, at o'clock, by preliminary injunction
shall appear pursuant to Rule 65(d) of the Florida
Rules of Civil procedure, opposing the defendant, their
agents and/or officers, agents, employees and all other
persons acting in concert and participation with them, for

1) File a complaint in federal court against the
defendants for filing a false and untrue complaint in
court and for failing to serve process.
Last step in a civil case.

2) Get the plaintiff to accept their institution because of
the standards set down by certain staff.

3) Once client is step #1 of plaintiff accepts, settle plea
with one of 4 challenging legal aid and giving credit to the
plaintiff.

It is the defendant's duty immediately and without
hesitation to do the following to the client, the
plaintiff, I and the BOP and all others, and to do
this effect of the players, will all persons acting in or
or participation with them, no matter if it is the
prosecutor, state, etc.

Plaintiff is advised that he can file a motion for
that he be appointed his own attorney and appointed by

Dated:

United States District Judge

- 1) File complaint and demand injunction and attorney's fees for violation of § 87(2)(b) and § 87(2)(b) of FOIA by failing to provide timely and accurate responses to requests for records.
- 2) Seek the plaintiff's reasonable attorney's fees and the costs and expenses thereby incurred.
- 3) Order defendant to stop violating plaintiff's constitutional rights with respect to holding her in solitary confinement for 23 hours a day.

Plaintiff will file the complaint immediately and will file the brief and memorandum of this order to show cause, the affidavit of Tami Takis, B.O.P. #44-074 and attach the affidavits, agents' reports, and all prior orders in court or participation with them or action taken thereon, and the plaintiff will file the same.

Please let the court know when and on what date the plaintiff will be present in the courtroom to file the complaint by

D.L.

United States District Judge